

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

GREGG SMITH,  
MICHAEL NOWAK,  
JEFFREY RUFFO, and  
CHRISTOPHER JORDAN,

Defendants.

No. 19 CR 669

Judge Edmond E. Chang

**UNOPPOSED MOTION FOR LEAVE TO EXCEED PAGE LIMITS**

The United States of America, by Robert Zink, Chief of the Fraud Section of the Criminal Division of the U.S. Department of Justice, respectfully submits this unopposed motion for leave for the government to file a brief in excess of the 15-page limit mandated by Local Rule 7.1. In support of this motion, the government states as follows:

1. The deadline for the government to file a motion to disqualify David Meister, counsel for defendant Michael Nowak, is January 10, 2020.
2. The government intends (i) to move for an order disqualifying Meister as counsel for Nowak in this case, and (ii) if the Court concludes disqualification is not required, to request that the Court require Nowak to provide his informed consent on the record waiving any actual or potential conflict of interest presented by Meister's representation of Nowak.

3. The government has conferred with counsel for Nowak concerning the government's request for leave to exceed the 15-page limit under Local Rule 7.1, and Nowak does not oppose the government's request.

4. The government respectfully submits that permitting the government to file a brief in excess of the 15-page limit, specifically, allowing the government to file a 33-page brief, is warranted in light of the legal and factual complexity of the issues in the government's motion.


WHEREFORE, the government respectfully requests that the Court grant the government's unopposed motion.

Dated: January 9, 2020

Respectfully submitted,

ROBERT ZINK  
Chief, Fraud Section  
Criminal Division  
U.S. Department of Justice

By:

  
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**CERTIFICATE OF SERVICE**

I, Matthew F. Sullivan, hereby certify that on January 9, 2020, I caused the foregoing Unopposed Motion for Leave to Exceed Page Limits to be electronically filed with the Clerk of Court by using the Court's electronic filing system, which will automatically send a notice of electronic filing to the parties who have entered an appearance in this case.

/s/Matthew F. Sullivan  
Matthew F. Sullivan